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) Case No.: 2:13-cr-00091-MMD-GWF

STIPULATION FOR PROTECTIVE ORDER

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The parties state as follows:

1 1. Protected Documents which will be used by the government in its case in chief
2 include personal identifiers, including social security numbers, drivers license numbers, dates of
3 birth, and addresses, of participants, witnesses, and victims in this case.

4 2. Discovery in this case is voluminous. Many of the documents include personal
5 identifiers. Redacting the personal identifiers of participants, witnesses, and victims would
6 prevent the timely disclosure of discovery to defendants.

7 3. The United States agrees to provide Protected Documents without redacting the
8 personal identifiers of participants, witnesses, and victims.

9 4. Access to Protected Documents will be restricted to persons authorized by the
10 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
11 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

12 5. The following restrictions will be placed on defendant, defendant's attorney(s)
13 and the above-designated individuals unless and until further ordered by the Court. Defendants,
14 defendants' attorneys and the above-designated individuals shall not:

15 a. make copies for, or allow copies of any kind to be made by any other
16 person of Protected Documents;

17 b. allow any other person to read Protected Documents; and


18 c. use Protected Documents for any other purpose other than preparing to
19 defend against the charges in the Superseding Indictment or any further superseding indictment
20 arising out of this case.

21 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made
22 pursuant to this order of the existence and terms of this Court's order.

7. The requested restrictions shall not restrict the use or introduction as evidence of discovery documents containing personal identifying information such as social security numbers, drivers license numbers, dates of birth, and addresses during the trial of this matter.

8. Upon conclusion of this action, defendant's attorney(s) shall return to government counsel or destroy and certify to government counsel the destruction of all discovery documents containing personal identifying information such as social security numbers, drivers license numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after the last appeal is final.

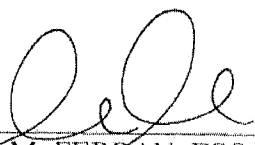
DANIEL G. BOGDEN
United States Attorney



ROGER YANG
Assistant United States Attorneys

4-24-13

DATE




ERICK M. FERRAN, ESQ.
Counsel for Luis Rafael Batista

4/23/13

DATE

ORDER

IT IS SO ORDERED this 29th day of April 2013.



GEORGE FOLEY, JR.
United States Magistrate Judge